

EXHIBIT A

Wolek, Adam

From: Wolek, Adam
Sent: Wednesday, December 6, 2017 3:44 PM
To: 'Wolfsohn, David J.'
Cc: Grohman, Christopher T.; Taylor, Sanna-Rae; Latsko, Julie M.
Subject: RE: Topstep v. OneUp- Jurisdictional Discovery

David,

As we noted several times below, the jurisdictional discovery would be directed to Mr. Alsabah's contacts with or acts targeting Illinois. While we are still preparing the actual requests, the requests will generally ask information about Mr. Alsabah's aliases/pseudonyms/account names, emails used, contacts with Illinois related to OneUp, communications about OneUp, his knowledge about and interaction with Topstep, etc. Depending on the sufficiency of the responses provided by Mr. Alsabah, the written discovery could potentially negate the need for a jurisdictional deposition. Accordingly, please let us know if Defendants will agree to jurisdictional discovery and the schedule, or your availability today or tomorrow morning for a meet and confer.

Regards,

Adam

From: Wolfsohn, David J. [mailto:DJWolfsohn@duanemorris.com]
Sent: Wednesday, December 6, 2017 1:03 PM
To: Wolek, Adam <awolek@taftlaw.com>
Cc: Grohman, Christopher T. <CTGrohman@duanemorris.com>; Taylor, Sanna-Rae <srtaylor@taftlaw.com>; Latsko, Julie M. <JMLatsko@duanemorris.com>
Subject: Re: Topstep v. OneUp- Jurisdictional Discovery

Adam,

Please send me the proposed document requests and interrogatories.

Please explain if this would relate to general or specific jurisdiction.

Please explain what you would cover in the deposition that wouldn't be answered by the document requests and interrogatories.

Thanks!

David J. Wolfsohn
Partner
Duane Morris LLP
30 South 17th St.
Philadelphia, PA 19103-4196

215 979 1866
Cell: 215 300 5020
Djwolfsohn@duanemorris.com

www.duanemorris.com

Sent from phone. Please excuse typos and autocorrect errors.

On Dec 6, 2017, at 1:29 PM, Wolek, Adam <awolek@taftlaw.com> wrote:

Hi David,

The requests will be directed to identifying information and documents about Mr. Alsabah's physical and electronic contacts with the State of Illinois by inquiring about: usernames, email addresses, and aliases used by Mr. Alsabah that are associated with Illinois, and residences and real property ownership. As well, the requests seek identification of publications and communications that were placed in or target individuals within the State of Illinois which were made by Mr. Alsabah and/or OneUp on his behalf. The deposition is intended to obtain facts confirming jurisdiction through unfiltered testimony of the party witness. Please let us know if Defendants will agree to the jurisdictional discovery and schedule, or your availability today or tomorrow morning for a meet and confer.

Thank you,

Adam

From: Wolfsohn, David J. [<mailto:DJWolfsohn@duanemorris.com>]
Sent: Wednesday, December 6, 2017 8:10 AM
To: Wolek, Adam <awolek@taftlaw.com>
Cc: Grohman, Christopher T. <CTGrohman@duanemorris.com>; Taylor, Sanna-Rae <srtaylor@taftlaw.com>
Subject: Re: Topstep v. OneUp- Jurisdictional Discovery

Hi Adam,
Please send me the proposed document requests and interrogatories.
Would this relate to general or specific jurisdiction?
Also please explain why you think you need a deposition. Thanks

David J. Wolfsohn
Partner
Duane Morris LLP
30 South 17th St.
Philadelphia, PA 19103-4196

215 979 1866
Cell: 215 300 5020
Djwolfsohn@duanemorris.com

www.duanemorris.com

Sent from phone. Please excuse typos and autocorrect errors.

On Dec 5, 2017, at 9:26 PM, Wolek, Adam <awolek@taftlaw.com> wrote:

Hi David,

We would be requesting narrow and limited discovery directed to jurisdictional questions related to Mr. Alsabah's targeting of Illinois, and his contacts thereto. We

would be amenable to limit our requests to five requests for production, five interrogatories, and one jurisdictional deposition about Mr. Alsabah's contacts with and targeting of Illinois.

Again, we would welcome your cooperation to avoid burdening the court and going through the time and expense of motion practice. Thank you.

Best regards,

Adam

From: Wolfsohn, David J. [<mailto:DJWolfsohn@duanemorris.com>]

Sent: Tuesday, December 5, 2017 7:36 PM

To: Wolek, Adam <awolek@taftlaw.com>

Cc: Grohman, Christopher T. <CTGrohman@duanemorris.com>; Taylor, Sanna-Rae <srtaylor@taftlaw.com>

Subject: Re: Topstep v. OneUp- Jurisdictional Discovery

Adam,

Please send me the requests and interrogatories you would like to serve and describe the subject matter you would want to cover in the deposition.

David J. Wolfsohn
Partner
Duane Morris LLP
30 South 17th St.
Philadelphia, PA 19103-4196

215 979 1866
Cell: 215 300 5020
Djwolfsohn@duanemorris.com

www.duanemorris.com

Sent from phone. Please excuse typos and autocorrect errors.

On Dec 5, 2017, at 7:59 PM, Wolek, Adam <awolek@taftlaw.com> wrote:

Counsel,

We reviewed Mr. Alsabah's motion to dismiss based on lack of personal jurisdiction and found that it is inextricably linked with issues surrounding his contacts with or acts targeting Illinois. Accordingly, we are requesting limited, narrow, and expedited jurisdictional discovery in the form of five requests for production, five interrogatories, and one deposition of Mr. Alsabah. Please let us know if you are amenable to the following timeline:

- **December 12:** deadline for Topstep's requests for production, interrogatories, and notice of deposition to be served upon counsel for OneUp and Mr. Alsabah
- **December 26:** deadline for responses to requests for production and interrogatories
- **January 9:** deadline to depose Mr. Alsabah
- **January 30:** deadline for Topstep's response to Mr. Alsabah's motion

Additionally, as Mr. Alsabah's motion is inextricably linked to the issues raised in OneUp's Motion to Dismiss, we request the deadline for Topstep's response to both motions to dismiss be set for January 30, 2018 as well.

We would welcome the procedural cooperation rather than going through the time and expense of motion practice and burdening the Court. Accordingly, please let us know if you agree to the timeline above, and if not, please let us know a time today, any time on Wednesday, or Thursday morning that you are available for a meet and confer. Thank you.

Regards,

Adam

Taft /

Adam Wolek / Partner
Taft Stettinius & Hollister LLP
111 E. Wacker Drive, Suite 2800
Chicago, Illinois 60601-3713
Tel: 312.527.4000 • Fax: 312.966.8598
Direct: 312.836.4063 • Cell: 312.860.9006
www.taftlaw.com / awolek@taftlaw.com

[Subscribe to our law updates](#)

This message may contain information that is attorney-client privileged, attorney work product or otherwise confidential. If you are not an intended recipient, use and disclosure of this message are prohibited. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

For more information about Duane Morris, please visit <http://www.DuaneMorris.com>

Confidentiality Notice: This electronic mail transmission is privileged and confidential and is intended only for the review of the party to whom it is addressed. If you have received this transmission in error, please immediately return it to the sender. Unintended transmission shall not constitute waiver of the attorney-client or any other privilege.